



Appellee's answering brief is due on or before February 16, 2018 and Appellant's reply brief is due within fourteen days of the filing of Appellee's answering brief.

3. Appellee has consulted with Appellant and both parties have agreed to extend the briefing schedule such that the deadline for Appellee to submit its answering brief is March 30, 2018 and the deadline for Appellant to submit its reply brief is April 13, 2018.

4. Appellee submits that good cause exists to modify the briefing schedule in the manner requested. This modified schedule will provide the parties with an opportunity to attempt a global multi-party settlement that impacts not only this Appeal, but also other matters, including the confirmation of the chapter 11 plan in the jointly administered cases of TK Holdings Inc. and its affiliated chapter 11 debtors.<sup>2</sup> If settlement occurs, it may resolve this Appeal.

*[Remainder of Page Intentionally Left Blank]*

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<sup>2</sup> *In re TKH Holdings Inc., et al.*, Case No. 17-11375 (Bankr. D. Del.).

WHEREFORE, Appellee respectfully requests that the Court enter an order, in the form attached hereto, modifying the briefing schedule in the manner set forth above, and grant such other and further relief as is just and proper under the circumstances.

Dated: February 9, 2018  
Wilmington, Delaware

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